

BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C. 20554

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**DEC 18 2000**  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Amendment of Section 73.202(b),  
Table of Allotments, )MM Docket No. 00-208 /  
RM-9977FM Broadcast Station )  
Huachuca City, Arizona )

To: Chief, Allocations Branch

**COMMENTS OF SANTA CRUZ BROADCASTING**Introduction

Santa Cruz Broadcasting ("Petitioner"), by its attorney, hereby submits its comments in response to the Notice of Proposed Rule Making ("Notice") in the above-captioned proceeding. In the Notice, the Commission proposed to amend the FM Table of Allotments (Section 73.202(b) of the Commission's Rules) by allotting Channel 232A to Huachuca City, Arizona, as that community's first local aural transmission service. In the Notice, the Commission also requested Petitioner to submit additional information to demonstrate that Huachuca City is a *bona fide* community for allotment purposes. The Notice was adopted in response to a Petition for Rule Making ("Petition") filed by Petitioner. The Petition is incorporated herein by reference.

Discussion

In response to the Notice, Petitioner submits that Huachuca City satisfies the Commission's definition of "community" for allotment purposes. Huachuca City is recognized

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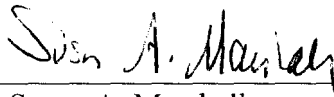
as a community in the Rand-McNally Commercial Atlas, 131st 2000 Millennium Edition . The Arizona Department of Commerce also recognizes Huachuca City as a community by providing a “Community Profile” which is attached hereto as Attachment A (the “Profile”). According to the Profile, as of 1998, Huachuca City had a population of 2,035 persons. Moreover, the Profile reflects that Huachuca City has an elected mayor and six council members; its law enforcement is provided by the Huachuca City Police Department; and Huachuca City has its own town hall, fire department, post office zip code (85616), public library, public elementary school, six public parks, a community center, senior citizens center, its own Industrial Development Authority, and many businesses.

#### Conclusion

As set forth in the Petition, the proposed allotment serves the public interest since it would satisfy the Commission’s technical rules and since it would provide Huachuca City with its first local aural transmission service. In addition, Petitioner confirms its earlier representation that it supports the proposed allocation and upon the Commission’s allotment of Channel 232A to Huachuca City, will promptly file an application for a construction permit on FCC Form 301 and, upon the Commission’s grant of that application, will expeditiously construct and operate a new FM station on that Channel at Huachuca City.

Respectfully submitted,

**SANTA CRUZ BROADCASTING**

By:   
Susan A. Marshall

Its Attorney

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December 18, 2000

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## **ATTACHMENT A**

Arizona Department of Commerce

# Community Profile

## Huachuca City

**Huachuca City**, also known as the Sunset City, is on state Highway 90, 64 miles southeast of Tucson. The community, at an elevation of 4,245 feet, was incorporated in 1958 but it originated as a stop on the now abandoned Southern Pacific Railroad between Tombstone and Patagonia, Arizona.

### PRINCIPAL ECONOMIC ACTIVITIES

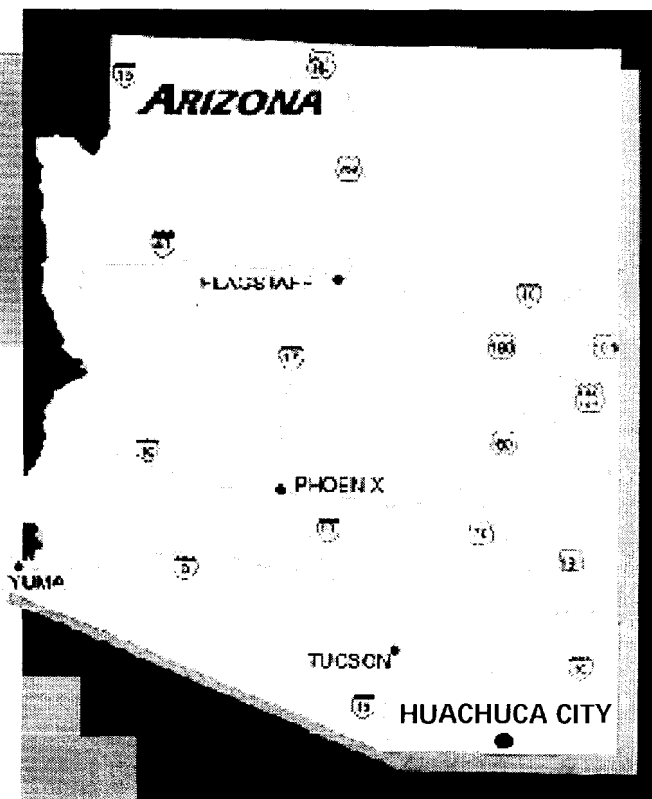
The Huachuca City economy is closely related to the U.S. Army's Fort Huachuca, headquarters for the Army's Information Systems Command, Intelligence Center and School, Electronic Proving Ground and Communications Electronic Installation Agency.

The city is just 20 miles from the Mexican border and has good potential for the twin plant industrial concept. This highly desirable location has made residential construction and retirement living important to the economy. The Huachuca Commercial Center (for improved industrial and commercial sites) is under construction and will have 40 acres. Undeveloped land, with city utilities available, is abundant around Huachuca City. All of Huachuca City is a designated Enterprise Zone.

### SCENIC ATTRACTIONS

Cochise County, in the southeast corner of Arizona, is unique in its historical, recreational and scenic features. The rugged mountains and broad grassy valleys were once dominated by the Apaches whose chief gave his name to the county. The struggle between the Chiricahua Apaches and the U.S. Cavalry is reflected in numerous sites throughout the county. These same mountains offer the visitor to Cochise County many opportunities to hike and wander through lush stands of ponderosa pine, douglas fir and quaking aspen. The Coronado National Forest is noted for a variety of wildlife and offer the hunter and the nature lover many hours of excitement and pleasure.

Within an hour drive of Huachuca City, visitors can see historic Cochise Stronghold, where Cochise sought refuge from the U.S. Cavalry and is buried. Fort Huachuca, established in 1877 as a cavalry post to safeguard settlers, now has an excellent museum.



Nearby are several ghost towns including Bisbee, a picturesque 1890s mining town built on mountain sides, with the infamous Brewery Gulch. State Highway 80 tunnels through a mountain pass to the Lavender Pit, the only open-pit mine on a major highway. Coronado National Memorial (a recreational area in Huachuca Mountains with spectacular views into Mexico), commemorates the first European expedition into the American Southwest.

Other attractions include: Tombstone (Historical Monument), the "Town Too Tough To Die," site of gun fights; old Cochise County Court House, now a state Historical Museum; Amerind Foundation Museum, has an outstanding display of Indian culture and artifacts.

Agua Prieta, Nogales and Naco, Mexican cities across the international border, offer shops, restaurants, night clubs and (in Nogales) colorful and exciting bullfights.

### POPULATION

	1980	1990	1998
Huachuca City*	1,661	1,782	2,035
Cochise County	85,686	97,624	123,750
Arizona	2,716,546	3,665,228	4,764,025

\* Local sources estimate the trade area population to be 45,000 for 1990.  
Sources: Arizona Department of Economic Security and U.S. Census Bureau.

### HUACHUCA LABOR FORCE DATA

	1980	1990	1998
Civilian Labor Force	586	630	661
Employed	513	573	599
Unemployed	73	57	62
Unemployment Rate	12.5%	9.0%	9.3%

Source: Arizona Department of Economic Security.

### GROWTH INDICATORS

	1990	1997	1998
Taxable Sales (\$)	4,942,500	10,612,200	10,253,000
Postal Receipts (\$)*	107,622	194,479	207,504
New Building Permits**	14	41	54
School Enrollment	1,897	1,490	1,069
Net Assessed Valuation (\$)	3,706,281	4,678,279	4,684,507

\* Postal receipts are for fiscal year.

\*\* Arizona Business, Arizona State University.

# Huachuca City

## PROPERTY TAX RATE PER \$100 ASSESSED VALUATION

	1990	1997	1998
AZ State Tax	\$ 0.47	\$ 0.00	\$ 0.00
Community College	1.62	1.74	1.74
Flood Control (Cnty.)	0.26	0.26	0.26
Library	0.14	0.16	0.16
County Fire District	0.10	0.10	0.09
County	3.67	3.51	3.51
County Total	\$ 6.26	\$ 5.77	\$ 5.76
School District	4.88	6.53	6.60
City	1.42	1.56	1.56
Total	\$12.56	\$13.86	\$13.92

Source: Arizona Tax Research Foundation.

Note: Property tax in Arizona is based on assessed valuation which is 10 percent of market value for residential property. Average tax rate on homes in Arizona before exemptions and rebates is 1.3% of market value.

## COMMUNITY FACILITIES

Huachuca City offers a range of community facilities including a community center that has a meeting room and kitchen, one library, a senior citizens center, and six parks with a Little League field, practice fields, tennis, basketball and volleyball courts, and a soccer field. To the south of Huachuca City, Huachuca Recreation Area offers outdoor activities including water sports at Park Canyon Lake. Patagonia Lake is a favorite recreational site for residents and visitors as well.

**Communication.** In addition to communication resources from the rest of the state, Huachuca City has one daily newspaper, *The Sierra Vista Herald Dispatch* and one weekly newspaper, *The Tombstone Tumbleweed*, several radio stations via cable from Tucson and Phoenix, and 12 television channels via cable from Tucson, Phoenix, Nogales, Los Angeles, and Atlanta.

**Educational.** Huachuca City has one public elementary school. High school students attend school in Tombstone. Cochise Community College-Sierra Vista Campus and the University of Arizona are within seven miles.

**Medical.** Three hospitals, one with 55 beds, one with 110 beds and one with 36 beds, 45 physicians, 22 dentists, eight chiropractors and two nursing homes are available in Sierra Vista.

**Financial.** Numerous banks have branch offices within 10 miles of Huachuca City. Businesses are eligible for assistance in financing fixed assets through the Finance Division of the Arizona Department of Commerce. Information on private activity bonds within the city may be obtained from the same source or from the Industrial Development Authority of Huachuca City, c/o Huachuca City Town Hall, 500 North Gonzales Blvd., Huachuca City, Arizona 85616.

**Governmental.** Huachuca City is governed by a mayor and six council members, and is served by the town police department and county sheriff's department; the fire department has 18 volunteers.

**Airport.** The residents of Huachuca City have access to the Sierra Vista Municipal Airport with three lighted runways, UNICOM radio and ground transportation within three miles.

**Industrial Properties.** There is one park with 46 acres, utilities, and state Highway 90 access. Contact the Town of Huachuca City.

## Utilities

Electricity:	Sulphur Springs Valley Electric Cooperative	(800) 422-9288
Natural Gas:	Southwest Gas Corporation	(520) 459-1702
Telephone:	U.S. West Communications	670-2355
Water & Sewer:	Municipal	456-1354
Solid Waste:	Municipal	456-1354

**Lodging and Meeting Facilities.** There are two motels with 47 units available and nine meeting facilities with the largest seating 200.

## WEATHER\*

Month	Average Temperature (°F)		Average Total Precipitation (Inches)
	Daily Maximum	Daily Minimum	
January	58.4	34.2	0.74
February	61.1	36.2	0.57
March	66.0	40.1	0.54
April	73.8	47.2	0.18
May	82.0	55.0	0.07
June	89.8	64.1	0.38
July	88.6	66.4	4.49
August	86.0	64.6	3.88
September	84.3	61.0	1.61
October	77.3	51.9	0.74
November	66.7	41.3	0.44
December	59.8	35.8	1.00
Year	74.5	49.8	14.64

Average Total Snow, Sleet and Hail Annually: 5.9 inches.

\* Fort Huachuca Reporting Station (based on a 30-year average).

This profile was prepared by the Arizona Department of Commerce Communications Division in cooperation with the Town of Huachuca City.

For further information, contact:

Town of Huachuca City  
500 N. Gonzales Blvd.  
Huachuca City, AZ 85616  
(520) 456-1354

Bulk orders and complete sets of profiles may be obtained at moderate cost from the Arizona Department of Commerce by calling (602) 280-1321.

## Arizona Department of Commerce

3800 N. Central Ave., Ste. 1400  
Phoenix, AZ 85012  
(602) 280-1321 FAX: (602) 280-1305  
<http://www.state.az.us/commerce>

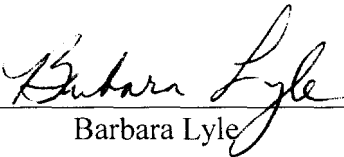
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**CERTIFICATE OF SERVICE**

I, Barbara Lyle, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., do hereby certify that a copy of the foregoing "Comments of Santa Cruz Broadcasting" was sent this 18th day of December, 2000, by hand-delivery to:

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Chief, Allocation Branch  
Policy & Rules Division, Mass Media Bureau  
Federal Communications Commission  
Room 3-A266, The Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Ms. Nancy Joyner  
Allocation Branch  
Policy & Rules Division, Mass Media Bureau  
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Barbara Lyle